

HEARING DATE AND TIME: TBD
RESPONSE DEADLINE: NOVEMBER 11, 2019
REPLY DEADLINE: DECEMBER 4, 2019

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Attorneys for Defendant John Fredriksen

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	Chapter 15
In re:	:	
	:	
PERFORADORA ORO NEGRO, S. DE R.L.	:	Case No. 18-11094 (SCC)
DE C.V., <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors in a Foreign Proceeding.	:	
	:	
-----	X	
GONZALO GIL-WHITE, PERSONALLY	:	Adv. Pro. No. 19-01294
AND IN HIS CAPACITY AS FOREIGN	:	
REPRESENTATIVE OF PERFORADORA	:	
ORO NEGRO, S. DE R.L. DE C.V. AND	:	
INTEGRADORA DE SERVICIOS	:	
PETROLEROS ORO NEGRO, S.A.P.I. DE	:	
C.V.,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	
ALP ERCIL, <i>et al.</i> ,	:	
	:	
Defendants.	:	
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**JOHN FREDRIKSEN'S NOTICE OF MOTION TO
DISMISS THE COMPLAINT WITH PREJUDICE**

PLEASE TAKE NOTICE, that upon the Complaint filed on July 10, 2019; Defendant John Fredriksen's ("Fredriksen") accompanying Memorandum of Law in Support of His Motion to Dismiss the Complaint With Prejudice (the "Motion to Dismiss"); the accompanying Declaration of Scott D. Musoff dated October 11, 2019, including the exhibits thereto; and upon all prior papers and proceedings herein, Fredriksen, by and through his undersigned counsel, will move this Court before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, in Courtroom 623 of the United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, NY 10004-1408, at a date and time designated by the Court, pursuant to Federal Rules of Civil Procedure 8(a), 12(b)(2) and 12(b)(6), as made applicable by Federal Rules of Bankruptcy Procedure 7008(a) and 7012(b), for the entry of an Order (i) dismissing the Complaint in its entirety with prejudice as against Fredriksen, and (ii) granting such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to a Stipulated Service and Response Schedule Order between counsel for Plaintiff and Fredriksen (ECF No. 41), Plaintiff shall file any response to the Motion to Dismiss on or before November 11, 2019, and Fredriksen shall file any reply in further support of the Motion to Dismiss on or before December 4, 2019. A hearing on the Motion to Dismiss will be held at a time and location to be determined by the Court.

Dated: October 11, 2019
New York, New York

/s/ Jay B. Kasner
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